UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND

MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, et al.

Re: Dkt. Nos. 3928, 3930, 3969, 3970

Debtors.1

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 4780-LTS

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

ISMAEL L. PURCELL-SOLER, ALYS COLLAZO-BOUGEOIS

Movants.

-against-

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICOELECTRIC POWER AUTHORITY,

Respondent.

This Informative Motion Relates Only to PREPA and Shall be Filed in Both the Lead Case No. 17 BK-3283-LTS and in PREPA's Title III Case No. 17 BK 4780-LTS

The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

JOINT INFORMATIVE MOTION REGARDING ISMAEL L. PURCELL-SOLER, ALYS COLLAZO-BOUGEOIS' MOTION FOR RELIEF FROM AUTOMATIC STAY

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>"), on behalf of the Puerto Rico Electric Power Authority ("<u>PREPA</u>") pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Ismael L. Purcell-Soler, Alys Collazo-Bougeois, and the community property comprised by them (collectively, "<u>Movants</u>"), by and through their undersigned counsel and respectfully submit this informative motion to inform the Court that PREPA and Movants (together, the "<u>Parties</u>") have consensually resolved the *Motion for Relief from Stay and for a Ruling that a Judgment on a Claim Arising from the Taking of Properties Without Just Compensation is not Subject to Reduction or Compensation in Bankruptcy* [Case No. 17-3283; ECF No. 3928] (the "<u>Motion</u>") filed by Movant.

Background

- 1. On September 12, 2018, Movants filed the Motion seeking that the Title III Stay be lifted to allow Movants to proceed with the case captioned *Ismael L. Purcell-Soler, Alys Collazo-Bougeois v. Puerto Rico Electric Power Authority*, civil case no. J DP 2012-0406 (605), Puerto Rico Court of First Instance, Ponce Part.
- 2. The Parties have met and conferred and have entered into a stipulation to resolve the Motion in its entirety. PREPA will include such stipulation in the next omnibus stay modification motion in accordance with Paragraph III.Q of Section III (Scheduling) of the *Sixth Amended Notice*,

The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the Debtors' representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA"), has authorized the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") to file this Informative Motion on behalf of PREPA. AAFAF is an entity of the Commonwealth of Puerto Rico authorized to act on behalf of PREPA pursuant to the authority granted to it under the Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2 2017.

Case Management, and Administrative Procedures [Case No. 17-03283; ECF No. 3804-1].

Therefore, Movants withdraw the Motion.

Dated: October 4, 2018. San Juan, Puerto Rico

Respectfully submitted,

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Movant

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